

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re:

OTR MEDIA GROUP, INC.

Debtor

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X

Chapter 11

Case No. 11-47385 (ESS)

**AMENDED NOTICE OF MOTION BY JANJAN REALTY FOR RELIEF FROM THE
AUTOMATIC STAY PURSUANT TO SECTION 362 OF THE BANKRUPTCY CODE
AND FOR RELATED RELIEF, INCLUDING DISMISSAL OF THE DEBTOR'S
CHAPTER 11 CASE**

PLEASE TAKE NOTICE that, Janjan Realty Corp. (the "Movant") moved [D.I. Nos. 537 and 538] for the entry of an order pursuant to Section 362 of the Bankruptcy Code modifying the automatic stay to permit the Movant to exercise its state law remedies against the Debtor and for related relief, including dismissal of the Debtor's chapter 11 bankruptcy case and for such other and further relief as this Court may deem just and proper (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion will be held before the Honorable Elizabeth S. Stong, United States Bankruptcy Judge, in Courtroom No. 3585 of the United States Bankruptcy Court for the Eastern District of New York (the "Bankruptcy Court"), Conrad B. Duberstein U.S. Courthouse, 271-C Cadman Plaza East, Brooklyn, NY 11201-1800, on November 19, 2013 at 9:00 a.m. (ET).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, conform to the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and the Local Rules for the United States Bankruptcy Court for the Eastern District of New York (the "Local Rules"); must be filed with the Bankruptcy Court electronically by registered users of the Bankruptcy Court's case filing system (the User's Manual for the

Electronic Case Filing System can be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties in interest, on a 3.5 inch disk, in text-searchable Portable Document Format (PDF), Wordperfect or any other Windows-based word processing format (in either case, with a hard-copy delivered directly to Chambers), and must be served upon (i) attorney for the Movant, Joseph A. Altman, P.C., 951 Bruckner Blvd., Bronx, New York 10459 (Attention: Joseph A. Altman) and (ii) the parties in interest who have requested notice pursuant to Bankruptcy Rule 2002 and the Local Rules, so as to be actually received not later than November 15, 2013 at 4:00 p.m. (ET). Only those responses that are timely filed, served and received will be considered at the hearing.

Only those responses that are timely filed, served and received will be considered at the hearing.

Failure to file a timely objection may result in entry of an order granting the Motion.

Dated: October 29, 2013
Bronx, New York

Joseph A. Altman, P.C.

By: /s/ Joseph A. Altman
Joseph A. Altman
951 Bruckner Blvd.
Bronx, New York 10459
Phone: 718-328-0422

Counsel for Janjan Realty Corp.

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Counsel for Janjan Realty Corp.